

**ETEXT ATTACHMENT**

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Federal Election Commission Inquiry  
December 23, 2004

Democratic Party of Wisconsin  
Identification Number: C00019331  
Reference: 12 Day Pre-General Report (10/1/04-10/13/04)

Response Due Date: January 24, 2005

Attn: Maureen Benitz  
Senior Campaign Finance Analyst, Reports Analysis Division

Request for additional information:

1) Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year...

Response: The Democratic Party of Wisconsin (DPW) in it's original solicitations, does include a clear and conspicuous request for the contributor information and informs the contributor of the requirements of federal law for the reporting of such information.

In order to comply with the formal requirements for "best efforts", the DPW, within 30 days of the receipt of a contribution makes a follow-up, stand alone effort, either by telephone or in the form of a written request to acquire missing information and:

- 1) Clearly asks for the missing information, without soliciting a contribution
- 2) Informs the contributor of the requirements of federal law for the reporting of such information, and
- 3) When the request is written, includes a pre-addressed return envelope.

2) Schedule B supporting Line 30(b) of your report discloses a payment(s) for.....

Response: The various payments identified for "Design and Printing Mail", "Design and Production Mail", "Id Walk Piece" and "Persuasion Mail Production" were expenses related to the production of various print pieces for the DPW Volunteer Mail effort, which must be paid for with 100% federal money, and meets the definition of exempt activity.

Additionally, the "Paid ID autocalls" and "Paid telephone identification calls" were part of a voter identification program, creating and enhancing voter lists by appending information to voter file regarding voter's likelihood of voting for a particular candidate and the likelihood that the person will vote in an upcoming election.

3) The limitation on making coordinated party expenditures on behalf of a Senate candidate for the 2004 general election....

Response: As identified in the request for additional information from the October monthly report, the amounts in question were incorrectly categorized and have been corrected to reflect the nature of the expenditure, Volunteer Mail activity, an exempt activity, which must be paid for with 100% federal money and is unlimited.

4) Schedule A supporting line 17 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee.....Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your

**ETEXT ATTACHMENT**

committee took in determining the amount(s) charged.

Response: The Democratic Party of Wisconsin (DPW) did assess the usual and normal charge for the goods and/or services provided to the purchasing entities. Consistent with FEC Advisory Opinion Number 2002-14, the DPW mailing list has been developed over a period of time, has a unique nature, and does not constitute merely a list or lists that were purchased from other sources. The DPW ascertains fair market value, consistent with its understanding of similar commercial products, and then enters into a bona fide, contractual, arm's length transaction with the purchaser - with consistent pricing for similar product. The DPW, valuing its list, does not provide the goods and/or services at less than the usual and normal charge, and therefore concludes that no contribution has occurred.